

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TBB INTERNATIONAL BANK CORP.,
Plaintiff,

v.

**JOSE ANTONIO OLIVEROS FEBRES, ET
AL.,**
Defendants.

CIVIL NO. 23-1310 (ADC)

MOTION FOR JOINDER

COME NOW Defendants Jose Antonio Oliveros-Febres and Holding Activo Ltd., through the undersigned counsel, and hereby STATE AND PRAY AS FOLLOWS:

1. Plaintiff TBB International Bank Corp. filed suit against Defendants AIB Properties Limited Ltd.; Consultora Baru 2018, C.A.; Gustavo Jose Gerardo Corredor-Salcedo; Don Goyo Corporation Aviation; El Retiro Group Ltd.; Mara Eugenia Febres Cordero Zamora; Gorlio Enterprises Ltd.; Holding Activo Ltd.; Intelinvest Casa de Valores, S.A. Inversiones Elektrogorsk, C.A.; Inversiones Saitam, S.A.; Alejandro Enrique Montenegro Diaz; Alexandra Oliveros Febres Cordero; Jose Antonio Oliveros Febres Cordero; Jose Antonio Oliveros Mora; and Alejandro J. Valencia Hurtado on June 12, 2023. (*See* Docket No. 1.) Plaintiffs alleged violations of the Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 U.S.C. § 1961, *et seq.*, and alleged violations of Puerto Rico law.
2. On September 25, 2023, Defendants Gustavo Jose Corredor-Salcedo and Alejandro Valencia-Hurtado moved to dismiss the complaint. (*See* Docket No. 24.)
3. Subsequently, on October 23, 2023, Defendants Don Goyo Corporation Aviation; Gorlio Enterprises Ltd.; and Alexandra Oliveros-Febres-Cordero also filed a motion to dismiss. (*See* Docket No. 30.)
4. On March 15, 2024, Defendants AIB Properties Limited Ltd.; El Retiro Group Ltd.; Maria

Eugenia Febres-Cordero-Zamora; and Jose Antonio Oliveros-Mora moved for dismissal of all claims against them, as well. (*See* Docket No. 54.)

5. Finally, on July 29, 2024, the appearing defendants moved for dismissal of all claims brought against them. (*See* Docket No. 71.)
6. On August 23, 2024, the Court issued an Opinion and Order granting in part and denying in part the motions to dismiss filed by Defendants Gustavo Jose Corredor-Salcedo and Alejandro Valencia-Hurtado; Defendants AIB Properties Limited Ltd.; El Retiro Group Ltd.; Maria Eugenia Febres-Cordero-Zamora; and Jose Antonio Oliveros-Mora; and Defendants AIB Properties Limited Ltd.; El Retiro Group Ltd.; Maria Eugenia Febres-Cordero-Zamora; and Jose Antonio Oliveros-Mora. (*See* Docket No. 74.) The Court dismissed all state law claims brought against the moving parties, but ordered the parties to conduct limited discovery to determine whether there is evidence of predicate acts in the possession of the defendants. (*See id.* at p. 20.)
7. On October 8, 2024, Plaintiff filed a motion for partial relief from the Court's Opinion and Order, arguing the Court erred in dismissing its state law claims as time barred. (*See* Docket No. 79.)
8. On October 22, 2024, codefendants Alejandro J. Valencia Hurtado and Gustavo José Gerardo Corredor Salcedo filed an opposition to Plaintiff's motion for partial relief. (*See* Docket No. 83.) The opposition filed by Valencia-Hurtado and Corredor-Salcedo raises arguments that apply with equal force to the appearing defendants.
9. Accordingly, we respectfully ask the Honorable Court to allow the appearing parties to join Valencia-Hurtado and Corredor-Salcedo's opposition as if it were filed by Defendants Jose Atonio Oliveros-Febres and Holding Activo Ltd.

10. This request is made in an effort to help preserve judicial resources and limit litigation expenses for all parties involved.

WHEREFORE, Defendant respectfully requests the Court **GRANT** this motion.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico on this 22nd day of October 2024.

WE HEREBY CERTIFY: Today we have electronically filed the foregoing document using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

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